

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**SYMBOLLOGY INNOVATIONS, LLC,
Plaintiff,**

v.

**Civil Action No. 2:15-cv-1169-JRG-RSP
(Consolidated)**

**ADAMS EXTRACT, et al.
Defendants.**

JOINT MOTION FOR ENTRY OF AMENDED DISCOVERY ORDER

Plaintiff Symbology Innovations, LLC and Defendants Aetna Inc., Cigna Health and Life Insurance Company, Cigna Dental Health, Inc., Government Employees Insurance Company d/b/a Geico, JetBlue Airways Corporation, Liberty Mutual Group Inc., OppenheimerFunds, Inc., Ralph Lauren Corporation, State Farm Mutual Automobile Insurance Company, LVMH Watch & Jewelry USA Inc., TD Bank N.A., Allstate Insurance Company, Wellmark, Inc. d/b/a Wellmark Blue Cross and Blue Shield of Iowa, Wellmark of South Dakota, Inc. d/b/a Wellmark Blue Cross and Blue Shield of South Dakota, Pinnacle Foods, Inc., J.D. Power & Associates, General Mills, Inc., j5create, Penrod Richard USA LLC, The Proctor & Gamble Company, and Jaguar Land Rover North America, LLC hereby jointly submit a proposed Amended Discovery Order, attached hereto. The proposed order differs from the current discovery order only in that the parties have agreed, given the number of defendants in this case, to increase the maximum time for depositions from 30 to 45 hours collectively.

Dated: February 12, 2016

Respectfully submitted,

/s/ Jay Brett Johnson

/s/ Garret A. Leach

Jay Brett Johnson
Kizzia & Johnson PLLC
750 N. St. Paul Street
Suite 1320
Dallas, Texas 75201
Tel: (214) 451-0164
Fax: (214) 451-0165
Email: jay@kjpllc.com

Garret A. Leach
Kirkland & Ellis LLP - Chicago
300 N LaSalle Street
Suite 2500
Chicago, IL 60654
312/862-2363
Fax: 312/862-2200
Email: garret.leach@kirkland.com

ATTORNEY FOR PLAINTIFF

Vishesh Narayen
Kirkland & Ellis LLP - Chicago
300 N LaSalle Street
Suite 2500
Chicago, IL 60654
312.862.2000
Fax: 312.862.2200
[Email: vishesh.narayen@kirkland.com](mailto:vishesh.narayen@kirkland.com)

Melissa Richards Smith
Gillam & Smith, LLP
303 South Washington Avenue
Marshall, TX 75670
903/934-8450
Fax: 903/934-9257
[Email: melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)

**ATTORNEYS FOR ALLSTATE
INSURANCE COMPANY**

/s/ Melissa R. Smith
Melissa Richards Smith
Gillam & Smith, LLP
303 South Washington Avenue
Marshall, TX 75670
903/934-8450
Fax: 903/934-9257
[Email: melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)

Saul Shapiro (ssapiro@pbwt.com)
Lupco "Lewis" Popovski
(lpopovski@pbwt.com)
Michael Fresco (mfresco@pbwt.com)
PATTERSON BELKNAP WEBB &
TYLER LLP
1133 Avenue of the Americas
New York, New York 10036

Telephone: 212-336-2000
Fax: 212-336-2222

***ATTORNEYS FOR DEFENDANT J.D.
POWER & ASSOCIATES***

/s/ Michael E. Jones
Michael E. Jones
SBN 10929400
Patrick C. Clutter
SBN: 24036374
POTTER MINTON, PC
110 North College Avenue
Suite 500
Tyler, Texas 75702
Telephone: 903.597.8311
Facsimile: 903.593.0846
mikejones@potterminton.com
patrickclutter@potterminton.com

***ATTORNEYS FOR DEFENDANT
JAGUAR LAND ROVER NORTH
AMERICA, INC.***

/s/ Peter John Ayers
Peter John Ayers
Lee & Hayes PLLC
11501 Alterra Parkway
Ste. 450
Austin, TX 78758
512-605-0252
Fax: 509-605-0269
[Email: peter@leehayes.com](mailto:peter@leehayes.com)

***ATTORNEY FOR DEFENDANT
J5CREATE***

/s/ Michael E. Jones
Michael E Jones
SBN 10929400
POTTER MINTON, PC
110 North College
Suite 500
Tyler, TX 75702
Telephone: 903-597-8311
Facsimile: 903-593-0846
mikejones@potterminton.com

Matthew J. Moore
LATHAM & WATKINS LLP
555 Eleventh Street, NW
Suite 1000
Washington, DC 20004
Telephone: 202-637-2200
Facsimile: 202-637-2201
matthew.moore@lw.com

Lisa K. Nguyen
LATHAM & WATKINS LLP
140 Scott Drive
Menlo Park, CA 94025
Telephone:
Facsimile:
lisa.nguyen@lw.com

Cassius K. Sims
LATHAM & WATKINS LLP
885 Third Avenue
New York, NY 10022
Telephone:
Fascimile:
cassius.sims@lw.com

***ATTORNEYS FOR DEFENDANT AND
COUNTERCLAIMANT
GOVERNMENT EMPLOYEES
INSURANCE COMPANY***

/s/Neil J. McNabnay
Neil J. McNabnay
mcnabnay@fr.com
Texas Bar No. 24002583
Bret T. Winterle
winterle@fr.com
Texas Bar No. 24084249
David B. Conrad
conrad@fr.com
Texas Bar No. 24049042
Ricardo J. Bonilla
rbonilla@fr.com
Texas Bar No. 24082704
1717 Main Street, Suite 5000
Dallas, Texas 75201

(214) 747-5070 - Telephone
(214) 747-2091 – Facsimile

***ATTORNEYS FOR CIGNA HEALTH
AND LIFE INSURANCE COMPANY,
CIGNA DENTAL HEALTH, INC.,
LIBERTY LIFE ASSURANCE
COMPANY OF BOSTON, LIBERTY
MUTUAL GROUP, INC.,
OPPENHEIMERFUNDS, INC., LVMH
WATCH & JEWELRY USA, INC.,
PINNACLE FOODS INC., RALPH
LAUREN CORPORATION, TD BANK,
N.A., WELLMARK, INC.,
WELLMARK OF SOUTH DAKOTA,
INC., AND PERNOD RICARD USA
LLC***

/s/ John K. Winn
Tonya M. Gray
Andrews Kurth LLP
1717 Main St
Suite 3700
Dallas, TX 75201
214-659-4400
Fax: 214-659-4401
[Email: tonyagray@andrewskurth.com](mailto:tonyagray@andrewskurth.com)

John K Winn
Leydig Voit & Mayer - Chicago
Two Prudential Plaza
180 North Stetson, Suite 4900
Chicago, IL 60601-6780
312/616-5600
Fax: 312/616-5700
[Email: jwinn@leydig.com](mailto:jwinn@leydig.com)

Steven P Petersen
Leydig Voit & Mayer - Chicago
Two Prudential Plaza
180 North Stetson, Suite 4900
Chicago, IL 60601-6780
312/616-5600
Fax: 312/616-5700
[Email: spetersen@leydig.com](mailto:spetersen@leydig.com)

ATTORNEYS FOR AETNA, INC.

/s/ Robert W. Kantner

Robert W. Kantner
Texas State Bar No. 11093900
[Email: rwkantner@jonesday.com](mailto:rwkantner@jonesday.com)
JONES DAY
2727 N. Harwood St.
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100

***ATTORNEY FOR THE PROCTER &
GAMBLE COMPANY***

/s/ Truman Fenton

R. William Beard, Jr. (SBN 00793318)
[Email: wbeard@sgbfirm.com](mailto:wbeard@sgbfirm.com)
Truman H. Fenton (SBN 24059742)
[Email: tfenton@sgbfirm.com](mailto:tfenton@sgbfirm.com)
Slayden Grubert Beard PLLC
401 Congress Avenue, Suite 1900
Austin, TX 78701
Tel: 512-402-3550
Fax: 512-402-6865

***ATTORNEYS FOR DEFENDANT
STATE FARM MUTUAL
AUTOMOBILE INSURANCE
COMPANY***

/s/ Ann Marie Duffy

Stephen E Baskin
Ann Marie Duffy
Saqib Javaid Siddiqui
Mayer Brown, LLP - DC
1999 K Street, NW
Washington, DC 20006-1101
(202) 263-3364
Fax: 202-263-5365
[Email: sbaskin@mayerbrown.com](mailto:sbaskin@mayerbrown.com)
[Email: aduffy@mayerbrown.com](mailto:aduffy@mayerbrown.com)
[Email: ssiddiqui@mayerbrown.com](mailto:ssiddiqui@mayerbrown.com)

***ATTORNEYS FOR JETBLUE AIRWAYS
CORP.***

/s/ Allan A. Kassenoff
Scott J. Bornstein
Email: bornsteins@gtlaw.com
Allan A. Kassenoff
Email: kassenoffa@gtlaw.com
Vimal M. Kapadia
Email: kapadiav@gtlaw.com
Greenberg Traurig LP
MetLife Building
200 Park Avenue
New York, NY 10166
Telephone: (212) 801-9200
Facsimile: (212) 801-6400

***ATTORNEYS FOR DEFENDANT
GENERAL MILLS, INC.***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 12, 2016.

/s/ Melissa Smith